

3. This Affidavit is submitted in support of my firm's application for an award of attorneys' fees in accordance with the Court's Order dated September 22, 2011. Separate fee affidavits are submitted by Plaintiffs' co-counsel, Allen P. Press and Joe Jacobson.

3. Nicole M. Acchione, and I are the two lawyers primarily responsible for this case in my office. We have both worked on the case since my firm's appointment as Class Counsel in 2006, and have been actively involved in all aspects of the litigation.

4. Ira Richards, also a member of TRR, became actively involved in this litigation during trial preparation and thereafter. When I received ALPA's Motion to Revoke the *Pro Hac Vice* Admissions of Mssrs. Press and Jacobson, I conferred to Mr. Richards to discuss strategy on responding to what I perceived to be a frivolous motion, and the appropriateness of filing a Rule 11 motion.

5. The total number of hours spent by my firm in bringing Plaintiffs' Motion for Sanctions Pursuant to Rule 11, and responding to Defendant's Motion to Revoke the *Pro Hac Vice* Admissions, is 11.1 hours.

6. The total billable time spent by my firm working on these two motions is **\$5,672.00**. This total was reached by multiplying the total number of attorney hours (11.1 hrs.) by the hourly rate charged by each attorney.

7. My current billing rate is \$600 per hour, as is Mr. Richards. Ms. Acchione's current billing rate is \$410 per hour.

8. These billing rates have been approved in other class actions pending in this vicinage by the Honorable Robert B. Kugler, U.S.D.J. in Lucas v. Vernon W. Hill, Civil Action No. 07-00349 (D.N.J. 2008) and the Honorable Noel L. Hillman, U.S.D.J. in In re: Pet Prods.

Liab. Litig., Civil Action No. 07-2867 (D.N.J. 2008).

9. Similar rates were approved by the Honorable Dickinson R. Debevoise in In re: Mercedes-Benz Tele Aid Contract Litigation, Civil Action No. 07-2720 (D.N.J. 2011); Honorable William H. Walls in In re Mercedes Benz Antitrust Litig., Civil Action No. 99-4311 (D.N.J. 2008) and In re Bulk Graphite Products Antitrust Litig., Civil Action No. 02-6030 (D.N.J. 2008), as well as Evans v. Lowes Home Centers, Civil Action No. 03-438 (E.D. Pa. 2008) (approving rate of \$350. Fee award 1.05 times the lodestar calculation). These rates are consistent with rates charged for attorneys from similar litigation firms with national practices that handle complex class action litigation.

10. Contemporaneous time records are attached hereto as Exhibit A (time records of Lisa Rodriguez and Nicole M. Acchione) and Exhibit B (time records of Ira Richards). The attached time records include a detailed description of the work performed by the attorneys in bringing the Rule 11 motion, and also responding to Defendant's Motion to Revoke the *Pro Hac Vice* Admissions.

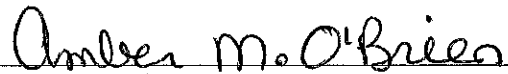
11. It is noteworthy that these time records do not reflect all of the time spent conferring with my partners and co-counsel as to the appropriateness of filing a Rule 11 motion, and defending against the frivolous allegations in the Motion to Revoke the *Pro Hac Vice* Admissions.

I declare under penalty of perjury under the laws of the State of New Jersey that the foregoing
is true and correct.



Lisa Rodriguez

Sworn to before me
this 6 day of October, 2011



Notary Public

AMBER M. O'BRIEN
A Notary Public of New Jersey
My Commission Expires July 9, 2012

EXHIBIT A

9/29/2011
11:32 AMTrujillo Rodriguez & Richards, LLC
Time Report Info

Page 1

Selection Criteria

Clien Selection Include: TWA Pilots
 Slip Selection Include: 213794; 214196; 214197; 214209; 214420; 214456; 214477; 214478; 214479;
 214483; 214485

Nickname TWA Pilots | 06-24010

Full Name

Address

Phone 1

Fax #

Phone 3

Phone 4

In Ref To

Fees Arg. By billing value on each slip

Expense Arg. By billing value on each slip

Tax Profile Exempt

Last bill

Last charge

Last payment Amount

Date	Timekeeper	Rate	Hours	Amount	Total
ID	Task	Markup %	DNB Time	DNB Amt	
8/11/2011	Nicole Miles-Ac	410.00	0.70	287.00	Billable
214196	Briefs/Motions Review Defendant's Motion to revoke A. Press and J.J pro hac vice; call with Lisa Rodriguez re. same				
8/11/2011	Nicole Miles-Ac	410.00	0.40	164.00	Billable
214197	Communicat/OP Letter to Fram regarding violation of Rule 11				
8/11/2011	Lisa Rodriguez	600.00	0.60	360.00	Billable
214477	Briefs/Motions Conference call re: Fram's motion to revoke pro hac; review draft letter to Fram.				
8/12/2011	Lisa Rodriguez	600.00	0.60	360.00	Billable
214478	Briefs/Motions Discussion with JHR re: filing sanctions; telephone conference re: appropriateness of Rule 11; Review draft of brief.				
8/15/2011	Lisa Rodriguez	600.00	1.50	900.00	Billable
213794	Post-Trial Review and revise sanctions brief				
8/16/2011	Nicole Miles-Ac	410.00	2.40	984.00	Billable
214209	Briefs/Motions Prepare Notice of Motion, cover letter, Declaration and revise Brief for Rule 11 motion				
9/6/2011	Nicole Miles-Ac	410.00	0.50	205.00	Billable
214420	Briefs/Motions Finalize, revise & prepare for filing Plaintiff's Motion for Rule 11 sanctions				

9/29/2011
11:32 AMTrujillo Rodriguez & Richards, LLC
Time Report Info

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TWA Pilots: (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
9/13/2011 214479	Lisa Rodriguez Briefs/Motions Revise letter to court re: motions; Office conference with Nicole Miles Acchione re: same	600.00	0.60	360.00	Billable
9/21/2011 214483	Lisa Rodriguez Hear/Conf Prep Telephone call from a. Press re: Conference call with court; review briefs in Support of pro hac vice revocation, sanctions	600.00	0.50	300.00	Billable
9/22/2011 214485	Lisa Rodriguez Court Hear/Conf Conference call with court re: pro hac vice revocation; sanctions	600.00	1.00	600.00	Billable
9/22/2011 214456	Nicole Miles-Ac Court Hear/Conf Conference call with Court and all counsel for oral argument on pro hac and Rule 11 Motion	410.00	1.20	492.00	Billable
TOTAL Billable Fees			10.00	\$5,012.00	
Total of billable expense slips				\$0.00	

Calculation of Fees and Costs

	Amount	Total
Fees Bill Arrangement: Slips By billing value on each slip.		
Total of billable time slips	\$5,012.00	
Total of Fees (Time Charges)		\$5,012.00
Total of Costs (Expense Charges)		\$0.00
Total new charges		\$5,012.00

EXHIBIT B

9/27/2011
10:27 AMTrujillo Rodriguez & Richards, LLC
Time Report Info

Page 1

Selection Criteria

Cle.Selection Include: TWA Pilots
Slip.Transaction Dat 8/10/2011 - 8/17/2011

Nickname TWA Pilots | 06-24010

Full Name

Address

Phone 1

Fax #

Phone 3

Phone 4

In Ref To

Fees Arg. By billing value on each slip

Expense Arg. By billing value on each slip

Tax Profile Exempt

Last bill

Last charge

Last payment Amount

Date ID	Timekeeper Task	Rate Markup %	Hours DNE Time	Amount DNE Amt	Total
<u>Timekeeper: Ira Neil Richards</u>					
8/12/2011	Ira 213817 Briefs/Motions Review Defendant's motion to revoke pro hac vice	600.00	0.30	180.00	Billable
8/12/2011	Ira 213819 Appellate Mot Telephone call to Nicole Miles Acchione re: JNOV, new trial; pro hac vice motion	600.00	0.30	180.00	Billable
8/12/2011	Ira 213843 Briefs/Motions Review letter to Defendant's; review rules re: Rule 11 motion; telephone call Nicole Miles Acchione re: same.	600.00	0.20	120.00	Billable
8/16/2011	Ira 213850 Communicat/FIRM Telephone call to Lisa Rodriguez re: Defendant's pro hac vice motion	600.00	0.20	120.00	Billable
8/16/2011	Ira 213858 Communicat/FIRM Review and respond to Nicole Miles Acchione email re: Jet Blue election.	600.00	0.10	60.00	Billable
Total: Ira Neil Richards			1.10		\$660.00